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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

| | | |
|---------------------------------------|---|--------------------------|
| UNITED STATES OF AMERICA, |) | NO.: 3:21-mj-71624-MAG |
| |) | |
| Plaintiff, |) | MOTION TO SEAL DOCUMENTS |
| |) | |
| v. |) | UNDER SEAL |
| |) | |
| Fernando VIERA, |) | |
| a/k/a Oscar F Viera, |) | |
| a/k/a Oscar Fernando Viera Rodriguez, |) | |
| a/k/a "Tata," |) | |
| Edgardo AGUILAR-CRUZ, |) | |
| a/k/a "Jose" |) | |
| Hector CASTENEDA, and |) | |
| Nolan RAMOS, |) | |
| a/k/a Nelson Ramos, |) | |
| |) | |
| Defendants. |) | |

The United States, by and through its counsel, Assistant United States Attorney SAILAJA M. PAIDIPATY, moves this Court for an order sealing the government's application for a sealing order, the sealing order, the Criminal Complaint, the Arrest Warrants, and all attachments in the above-referenced matter. Disclosure of the specified documents might jeopardize the defendants' arrests.

Accordingly, the United States requests that the Court seal these documents, except that the Clerk of Court shall provide copies of the sealed documents to employees of the United States

1 Attorney's Office. The United States further requests that the United States Attorney's Office be
2 permitted to share these documents as necessary to comply with its discovery obligations, and with the
3 Drug Enforcement Administration (DEA), which should be allowed to share the results of the these
4 documents with other law enforcement and intelligence agencies, including foreign law enforcement and
5 intelligence agencies, for use in investigation and prosecution.

6 DATED: October 11, 2021

Respectfully submitted,

7 STEPHANIE M. HINDS
8 Acting United States Attorney

9 _____
10 /s/
11 SAILAJA M. PAIDIPATY
12 Assistant United States Attorney
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